

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
UNITED STATES OF AMERICA, :

- against - :

ANNE HALL, :

Defendant. :  
-----X

**NOTICE OF MOTION**  
07 CR 406 (RJS)

S I R S / M A D A M S :

**PLEASE TAKE NOTICE**, that, upon the annexed affidavit of **LEE GINSBERG, ESQ.**, duly sworn to the 7<sup>TH</sup> day of November 2007, and all the proceedings previously held in this lawsuit, the defendant ANNE HALL, will make a motion before this Court, Hon. Richard J. Sullivan presiding, at a date and time to be determined, for the following relief pursuant to the Federal Rules of Criminal Procedure, and the inherent supervisory power of the Court and for issuance of the following orders:

- I. A Severance of defendant Anne Hall from the trial of co-defendant Clyde W. Hall.
- II. Discovery pursuant to Rule 16 of the Fed. R. Crim. Proc.
- III. A Bill of Particulars.
- IV. Disclosure Pursuant to Fed. R. Evidence 403 and 404.
- V. Exculpatory material pursuant to Brady v. Maryland, etc.
- VI. Permission to join in motions of co-defendant.
- VII. Permission to file additional motions.

Respectfully submitted,

By: 

LEE GINSBERG (LG7724)  
FREEMAN, NOOTER & GINSBERG  
Attorney for Defendant  
**ANNE HALL**  
30 Vesey Street, Suite 100  
New York, New York 10007  
(212) 608-0808

TO: CLERK OF THE COURT  
Thomas Brown, Esq. (AUSA)  
All Counsel